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13 Attorneys for Defendant
14 CITY AND COUNTY OF SAN FRANCISCO

15 UNITED STATES DISTRICT COURT

16 NORTHERN DISTRICT OF CALIFORNIA

17 ANDREW KING,

18 Plaintiff,

19 vs.

20 CITY AND COUNTY OF SAN
21 FRANCISCO, PUBLIC UTILITIES
22 COMMISSION, SAN FRANCISCO WATER
23 DEPARTMENT, and DOES 1 to 25,

24 Defendants.

25 Case No. CV-11-1857 WHA

26 **DEFENDANT'S PRETRIAL DISCLOSURES**

27 [FRCP 26(A)(3)]

28 Pursuant to Federal Rule of Civil Procedure 26(a)(3), Defendant City & County of San
Francisco ("Defendant" or the "City"), submits the following pretrial disclosures.

29 **I. TRIAL WITNESSES**

30 A. Defendant expects to call the following witnesses at trial:

31 Bill Teahan (party witness, contact through defense counsel);

32 Frank Marovich (party witness, contact through defense counsel);

33 Lorceli Braganza (party witness, contact through defense counsel);

34 Silvia Castellanos (party witness, contact through defense counsel);

1 Lori Regler (party witness, contact through defense counsel);

2 Jenee Jackson (party witness, contact through defense counsel);

3 B. Defendant may also call the following additional witnesses if the need arises:

4 John Mercurio (party witness, contact through defense counsel);

5 Andy Geddes (party witness, contact through defense counsel);

6 Fatima Taylor, California Pacific Medical Center/Sutter Health, P.O. Box 7999, San
7 Francisco, CA (415) 600-6000;

8 Daniel Null, M.D., 1701 Divisadero St., Suite 500, San Francisco, CA 94143 (415)
9 353-7300.

10 Custodian of Records for SFPUC

11 **II. WITNESSES WHOSE TESTIMONY THE CITY EXPECTS TO PRESENT BY
12 DEPOSITION**

13 Plaintiff.

14 **III. IDENTIFICATION OF EXHIBITS**

15 A. The City expects to offer the following documents or other exhibits at trial:

16 -Jan. 23, 2009 revised essential functions guide sent from Dr. Daniel Null to
17 Lorcelli Braganza with clarifying notes of Ms. Braganza from class with Dr. Null on 1/27/2009 (Ex. B
18 to SJ motion, CCSF 000469-71);

19 -Feb. 2, 2009 letter from Lorceli Braganza to Andrew King (Ex. C to SJ motion,
20 CCSF 000381-82);

21 -May 8, 2009 letter from Lorceli Braganza to Andrew King with attachments
(Ex. D to SJ motion, CCSF 000432-34);

22 -Feb 2, 2010 letter from Fatima Taylor to Andrew King (Ex. E to SJ motion,
23 CCSF 000406);

24 -Plaintiff's Feb. 2010 Reasonable Accommodation Request Form and
25 attachments (Ex. F to SJ motion, CCSF 000437-440);

26 -Feb. 15, 2010 letter of Dr. Daniel Null (Ex. G to SJ motion, CCSF 000441);

1 -Mar. 9, 2010 letter from Fatima Taylor to Andrew King (Ex. H to SJ motion,
2 CCSF 000401);

3 -Apr. 29, 2010 letter from Silvia Castellanos to Plaintiff (Ex. J to SJ motion,
4 CCSF 000399);

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6 B. The City may offer the following documents or other exhibits at trial if the need arises:
7 -portions of Plaintiff's deposition transcript for impeachment purposes
8 -SFERS Notification of [Plaintiff's] Intent to Retire dated April 14, 2010 (Ex. I
9 to SJ motion)

10
11 Dated: August 20, 2012

12 DENNIS J. HERRERA
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14 ELIZABETH S. SALVESON
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16 ANDREW GSCHWIND
17 Deputy City Attorney

18 By: /s/Andrew Gschwind
19 ANDREW GSCHWIND

20 Attorneys for Defendant
21 CITY AND COUNTY OF SAN FRANCISCO